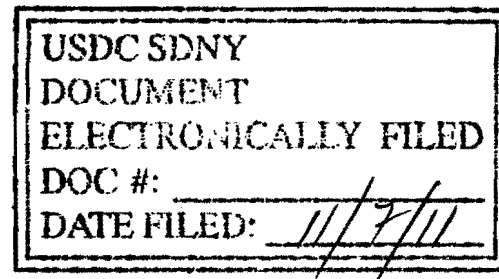


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



----- X
MATILDA BELOVIC, by her next friend,
SUELLEN TOZZI; GENEVIEVE C.;
MADELAINE ANDREWS; MARY B.; and
MAUREEN CURRAN, by her next friend,
SARAH T. GILLMAN, individually, and on
behalf of all others similarly situated,

Plaintiffs,

07 Civ. 02876 (LAP)(KNF)

-against-

STIPULATION AND ORDER

ROBERT DOAR, as Commissioner of the New
York City Human Resources Administration;
GLADYS CARRION, as Commissioner of the
New York State Office of Children & Family
Services; DAVID HANSELL, as Acting
Commissioner of the New York State Office of
Temporary & Disability Assistance; and
RICHARD F. DAINES, as Acting Commissioner
of the New York State Department of Health,

Defendants.

----- X
WHEREAS, Plaintiffs commenced this action on April 10, 2007 by filing a class action complaint pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 12132 et seq., 29 U.S.C. § 794 et seq., and N.Y. Soc. Serv. Law § 473 et seq. for declaratory and injunctive relief on behalf of all current and future clients of the New York City Human Resources Administration's Adult Protective Services program ("APS") who allege that they did not receive, are not receiving or will not receive the protective services from APS to which they are legally entitled;

WHEREAS, Defendant ROBERT DOAR, as Commissioner of the New York City Human Resources Administration ("Defendant Doar"), has denied any and all liability arising out of Plaintiffs' allegations; and

WHEREAS, Plaintiffs and Defendant Doar desire to resolve the issues raised in this litigation, without further proceedings and without admitting any fault or liability and have therefore agreed to the terms of a Stipulation of Settlement, attached hereto (without exhibits) as Exhibit A, and a Stipulation and Order for Attorneys' Fees and Costs, attached hereto (without exhibits) as Exhibit B;

NOW, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned attorneys for the Plaintiffs and Defendant Doar herein, that the procedure for notifying the class of the proposed settlement and the holding of the Fairness Hearing shall be as follows, subject to the approval of the Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure:

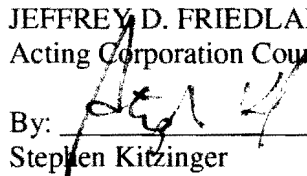
Method of Sending Notice of Proposed Settlement. Within twenty-one (21) days of the date this Order is entered, Defendant Doar shall mail the Class Settlement Notice attached hereto as Exhibit C to current members of the class as defined in the Stipulation of Settlement, to the most recent address known to Defendant Doar. No later than twenty-eight (28) days after this Order is entered, Defendant Doar's counsel shall file with the Court a declaration stating that the Class Settlement Notice was timely mailed.

Objections or Support. Any Class Member shall have the right to appear and be heard at the Fairness Hearing, provided that the Class Member provides written notice of intent to appear and be heard pursuant to the terms of the Class Settlement Notice. Any Class Member who does not make his or her objection at the Fairness Hearing or in writing prior to the Fairness Hearing shall be deemed to have waived such opportunity and shall forever be foreclosed from making any objection to the Stipulation of Settlement unless otherwise ordered by the Court.

Fairness Hearing. A Fairness Hearing will be held on JANUARY 6, ²⁰¹²~~2011~~, at 10:00 a.m. ~~m.~~, in Courtroom 12A, at United States District Courthouse, 500 Pearl Street, New York,

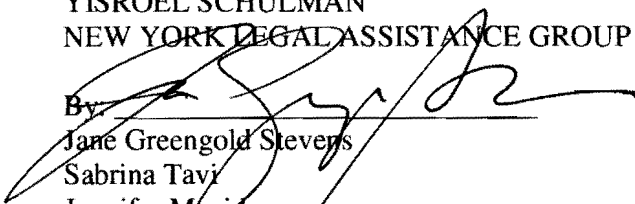
New York, 10007, at which time the Court will determine whether the certification of a class for settlement purposes and settlement of the Action on the terms set forth in the Stipulation of Settlement attached hereto as Exhibit A and the Stipulation and Order for Attorney's Fees and Costs attached hereto as Exhibit B should be finally approved as fair, reasonable, and adequate and whether the Stipulation of Settlement shall be entered as the Final Judgment in this case.

JEFFREY D. FRIEDLANDER
Acting Corporation Counsel of the City of New York

By: 
Stephen Kitzinger
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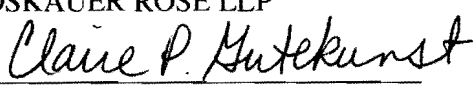
Attorney for Defendant Doar

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Attorneys for Plaintiffs

SO ORDERED this 7th day of November, 2011.


Hon. Loretta A. Preska
United States District Judge